

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

HANS MOKE NIEMANN,

Plaintiff,

v.

SVEN MAGNUS ØEN CARLSEN A/K/A
MAGNUS CARLSEN, PLAY MAGNUS AS
D/B/A PLAY MAGNUS GROUP, CHESS.COM,
LLC, DANIEL RENSCH A/K/A “DANNY”
RENSCH, AND HIKARU NAKAMURA,

Defendants.

Case No. 4:22-cv-01110-AGF

**DECLARATION OF NIMA H.
MOHEBBI IN SUPPORT OF
DEFENDANT CHESS.COM, LLC’S
MOTION TO DISMISS PLAINTIFF’S
SECOND AMENDED COMPLAINT
AND/OR TO COMPEL ARBITRATION**

Hon. Audrey G. Fleissig

I, Nima H. Mohebbi, make this declaration in support of Chess.com, LLC’s (“Chess.com’s”) Motion to Dismiss Plaintiff’s Second Amended Complaint and/or to Compel Arbitration, submitted herewith in the above-captioned suit. I hereby declare that:

1. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could and would testify competently thereto.

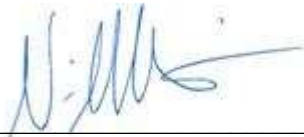
2. I am an attorney and a member in good standing of the State Bar of California. I am admitted *pro hac vice* to practice before this Court in this matter. I am a Counsel with the law firm of Latham & Watkins LLP, counsel of record for Defendant Chess.com.

3. I have reviewed an article published by The Guardian that is dated September 23, 2022 and titled “The people who police chess cheats: ‘We built a crime scene analysis for every player in the world.’” Plaintiff Hans Niemann quotes from this article in his Second Amended Complaint (“SAC”) and relies on the contents of this article in support of his defamation claims. (See SAC ¶¶ 114-15, 208-19.) The article is publicly available on The Guardian’s website at

<https://www.theguardian.com/sport/2022/sep/23/the-people-who-police-chess-cheats-we-built-a-scene-analysis-for-every-player-in-the-world>. On January 23, 2023, I caused a copy of this article to be downloaded and saved as a PDF. The PDF of the article, which is a true and correct copy of the article as it appeared on The Guardian's website on January 23, 2023, is attached hereto as **Exhibit 1**.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of January, 2023 at Los Angeles, California.



Nima H. Mohebbi

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 24, 2023, the foregoing document was served on all counsel of record by ECF.

DATED: January 24, 2023

/s/ Nima H. Mohebbi

Nima H. Mohebbi (# 275453CA)

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